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Attorney for Plaintiff
HB Productions, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HB Productions, Inc.,)	Case No.: 1:19-cv-487-JMS-KJM
)	(Copyright)
Plaintiff,)	
vs.)	PLAINTIFF'S MOTION FOR
)	DEFAULT JUDGMENT AGAINST
Muhammad Faizan,)	DEFENDANT MUHAMMAD
)	FAIZAN; MEMORANDUM IN
Defendant.)	SUPPORT OF MOTION;
)	DECLARATION OF COUNSEL;
)	EXHIBITS 1-5; BILL OF COSTS;
)	CERTIFICATE OF COMPLIANCE
)	WITH LR 7.4(b)
)	
)	

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANT MUHAMMAD FAIZAN

Plaintiff HB Productions, Inc., by and through its counsel, respectfully move that this Court enter a default judgment in Plaintiff's favor for the relief demanded in its First Amended Complaint filed on February 14, 2020 pursuant to Fed. R. Civ. P. 55(b)(2) on the grounds that Defendant Muhammad Faizan ("Faizan") has

failed to answer or otherwise defend the First Amended Complaint, and Plaintiff is entitled to judgment as a matter of law against Defendant Faizan. Plaintiff seeks judgment against Defendant Faizan for statutory damages in the amount of \$150,000, reasonable attorney's fees in the amount of \$12,832.50, Hawaii General Excise Tax related to those fees in the amount of \$568.86 and taxable costs of \$4714 as a final judgment.

Plaintiff further seek injunctive relief permanently enjoining and restraining Defendant from directly infringing, inducing and/or contributing to infringement of the Plaintiff's copyrighted Work. This motion is based upon the Memorandum in Support, the Declaration of Counsel, and the pleadings and record herein.

Plaintiff requests that this motion be decided without a hearing per LR 7.1(c).

DATED: Kailua-Kona, Hawaii, July 22, 2020.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiff
HB Productions, Inc.